

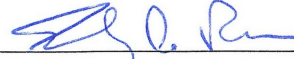
Andrew R. Dunlap
adunlap@selendygay.com

April 27, 2022

Via ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Defendants' request to file under seal Exhibits 4, 6, and 8 to the Declaration of Andrew R. Dunlap is granted. SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: April 28, 2022

New York, New York

**Re: *Deutsche Bank Securities Inc. v. Kingate Global Fund Ltd., et al.*,
No. 19-cv-10823-ER (S.D.N.Y.)**

Dear Judge Ramos,

We write on behalf of Defendants Kingate Global Fund, Ltd. and Kingate Euro Fund, Ltd. (the “Funds”), pursuant to Paragraph 3.ii of Your Honor’s Individual Practices, for approval to file a redacted version of Defendants’ memorandum of law in support of their motion to compel Plaintiff Deutsche Bank Securities Inc. (“DBSI”) and three non-parties (the “Withholding Investors”)¹ to produce documents they are withholding based solely on the common interest doctrine (“Motion to Compel”), and to file under seal Exhibits 4, 6, and 8 to the Declaration of Andrew R. Dunlap in support thereof (“Declaration”).

The Funds’ motion to compel describes, and the Declaration attaches as exhibits, documents that DBSI has designated as “Confidential,” which, according to the Protective Order, represents DBSI’s good faith judgment that disclosure of the information would “be detrimental to the conduct of [DBSI’s] business or the business of any of [its] customers or clients.” See ECF No. 48 ¶ 2(a).² Paragraph 12 of the Protective Order requires the Funds to file such information under seal, and pursuant to Paragraph 15 of the Protective Order, the Funds notified DBSI that they plan to file the documents under seal, and to redact references to non-public, protected information in the motion to compel.

The Funds respectfully request that the Court grant this letter motion allowing the Funds to file the proposed redacted version of the motion to compel and to file under seal Exhibits 4, 6, and 8 to the Declaration.

¹ The Withholding Investors are: Centerbridge Partners LP, Farallon Capital Management LLC, Solus Alternative Asset Management LP.

² The Funds take no position on and reserve all rights to challenge these confidentiality designations.

The Honorable Edgardo Ramos
April 27, 2022

Respectfully submitted,

/s/ Andrew R. Dunlap
Andrew R. Dunlap

/s/ Hugh M. McDonald
Hugh M. McDonald

*Attorneys for Defendants Kingate
Global Fund Ltd. and Kingate Euro
Fund Ltd.*

Cc: Counsel of Record